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Filing date: **10/01/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91207213
Party	Defendant Joseph A. Fay
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Submission	Answer
Filer's Name	James L. Vana
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Signature	/James L. Vana/
Date	10/01/2014
Attachments	Answer to Notice of Opposition.pdf(189536 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Chicago Cubs Baseball Club, LLC,
Washington Nationals Baseball Club, LLC
Opposers,

v.

Joseph A. Fay,

Applicant.

Opposition No.: 91207213

**APPLICANT'S ANSWER TO NOTICE OF
OPPOSITION**

Applicant Joseph A. Fay ("Applicant"), owner of Application No. 85452733 for the mark THE BIG W ("Applicant's Mark"), by and through its undersigned counsel, hereby submits this answer to the Notice of Opposition as follows:

1. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 1, and therefore denies them.
2. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 2, and therefore denies them.
3. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 3, and therefore denies them.
4. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 4, and therefore denies them.
5. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 5, and therefore denies them.
6. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 6, and therefore denies them.
7. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 7, and therefore denies them.

8. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 8, and therefore denies them.

9. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 9, and therefore denies them.

10. Applicant lacks knowledge or information sufficient to form a belief as to the allegations found in Paragraph 10, and therefore denies them.

11. Applicant admits the allegations found in Paragraph 11.

12. Applicant admits the allegations found in Paragraph 12.


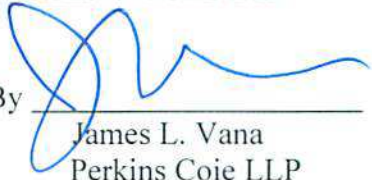
13. Applicant denies the allegations found in Paragraph 13.

14. The allegations found in Paragraph 14 assert a legal conclusion, and thus Applicant contends that no answer is required.

15. Applicant denies the allegations found in Paragraph 15.

WHEREFORE, Applicant respectfully requests that the Opposition be dismissed.

DATED: October 1, 2014

<p>CERTIFICATE OF SERVICE</p> <p>I hereby certify that this, ANSWER TO NOTICE OF OPPOSITION, is being deposited with the United States Postal Service with sufficient postage as first class mail on October 1, 2014 in an envelope addressed to Opposer's counsel:</p> <p>SETH SHAFER COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036.</p> <p>Signature: <u></u></p> <p>Printed Name: <u>Linda L. Martin</u></p>	<p>PERKINS COIE LLP</p> <p>By <u></u></p> <p>James L. Vana Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 (206) 359-3036 Attorney for Applicant</p>
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